

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

AMEREN TRANSMISSION COMPANY OF ILLINOIS)	
)	
Petition for a Certificate of Public Convenience and)	
Necessity, pursuant to Section 8-406.1 of the Illinois)	
Public Utilities Act, and an Order pursuant to Section 8-)	Docket No. 12-0598
503 of the Public Utilities Act, to Construct, Operate and)	
Maintain a New High Voltage Electric Service Line and)	
Related Facilities in the Counties of Adams, Brown,)	
Cass, Champaign, Christian, Clark, Coles, Edgar, Fulton,)	
Macon, Montgomery, Morgan, Moultrie, Pike,)	
Sangamon, Schuyler, Scott and Shelby, Illinois.)	

**AMEREN TRANSMISSION COMPANY OF ILLINOIS’
RESPONSE TO STAFF MOTION TO REVISE CASE MANAGEMENT PLAN**

Ameren Illinois Transmission Company (ATXI) submits this Response to the Motion To Revise The Case Management Plan (Motion) filed by the Staff in which Staff seeks to modify the schedule in this proceeding due to scheduling constraints involving one of its lawyers. While ATXI is willing to accommodate the Staff lawyer’s needs as a matter of professional courtesy, ATXI opposes Staff’s proposed revisions to the schedule. The revisions are unfair and unduly prejudicial to ATXI and inappropriately burden witnesses in this case rather than lawyers. However, in this Response ATXI offers a compromise proposal that could accommodate the Staff lawyer’s schedule, while placing any burden on lawyers in this expedited proceeding, rather than witnesses.

In its Motion, Staff seeks to expedite the schedule in this case even further because, Staff explains, one of its lawyers, Ms. Armstrong, will be unavailable after May 7, 2013 due to her wedding. The hearings in this matter are currently scheduled to end on May 17, 2013, or 10 days after the Staff lawyer is unavailable. Staff proposes to advance the hearings by two weeks, taking one week from the time for Staff and Intervenors’ direct testimony and one week from the time for ATXI’s rebuttal.

Taking one week from each side is not fair. What Staff is proposing is to reduce the *remaining* time for Staff and Intervenor’s witnesses to prepare their testimony – approximately eight more weeks – by approximately 12.5%, while reducing the *entire* time for ATXI’s witnesses to prepare their testimony in response to 49 parties’ testimony by 25%. Moreover, Staff affords ATXI only one week to conduct discovery after the last round of Staff and Intervenor testimony. This is not fair. What Staff does not propose to reduce by any amount is the time set aside in the schedule for lawyers to prepare for the evidentiary hearings. In addition, while Ms. Armstrong becomes unavailable 10 days before the end of hearings, Staff proposes to remove 14 days from the schedule. As indicated, ATXI is willing as a matter of professional courtesy to accommodate Ms. Armstrong’s full participation in this case. However, the burden of that accommodation should not fall disproportionately on ATXI’s witnesses, with no burden whatsoever on any counsel.

Accordingly, ATXI has developed an alternative revised schedule that would allow the completion of hearings before Ms. Armstrong becomes unavailable on May 8, which more fairly apportions the reduction of time for testimony preparation.

The following chart sets forth the current schedule, the Staff proposal and ATXI’s compromise proposal:

Activity	Existing Date	Staff Proposal	ATXI Compromise
Staff and Intervenor direct testimony	March 29	March 22	March 22
Staff/Intervenor cross-rebuttal	April 12	April 5	April 3
ATXI rebuttal	April 26	April 12	April 17
Written pre-hearing motions	May 3	April 19	April 22
Motion hearing	May 8	April 24	April 25
Evidentiary hearings	May 13-17	April 29-May 3	May 1-3, 6-7

Under ATXI's proposal, Staff and Intervenor's see their remaining time for direct testimony reduced by 12.5% (as Staff proposed), ATXI's witnesses see their entire time for rebuttal reduced by about 7%, and there is adequate time to prepare for hearings thereafter. The hearings will thus conclude before Ms. Armstrong's time out of the office begins on May 8.

To the extent that Intervenor's seek additional time beyond the March 22 date proposed by Staff and reflected in ATXI's proposal, such additional time should be made available by reducing the 14 days between the filing of ATXI's rebuttal and the commencement of hearings.

Accordingly, should the ALJs determine to grant a change in the schedule, in this Response ATXI offers a compromise proposal that would accommodate the Staff lawyer's schedule, while placing any burden on lawyers in this expedited proceeding, rather than witnesses.

WHEREFORE, based on the arguments and positions set forth above, Ameren Transmission Company of Illinois respectfully requests that the Illinois Commerce Commission deny Staff's Motion. In the alternative, ATXI proposes its alternative schedule.

Dated: January 31, 2013

Respectfully submitted,

Ameren Transmission Company of Illinois

/s/ Albert D. Sturtevant

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CERTIFICATE OF SERVICE

I, Albert D. Sturtevant, an attorney, certify that on January 31, 2013, I caused a copy of the foregoing *Ameren Transmission Company of Illinois' Response to Staff Motion to Revise Case Management Plan* to be served by electronic mail to the individuals on the Commission's Service List for Docket 12-0598.

/s/ Albert D. Sturtevant

Attorney for Ameren Transmission
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